

AO 91 (Rev. 11/11) Criminal Complaint

AUSA Abigail L. Peruso (312) 353-5342

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

E JAN 25 2019

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

MICHAEL LIEDTKE

CASE NUMBER:

19CR 077

UNDER SEAL

MAGISTRATE JUDGE VALDEZ**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about December 16, 2018, at Streamwood, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

Title 18, United States Code, Section
2251(a)

Offense Description

did knowingly employ, use, persuade, induce, entice, and coerce a minor, namely Minor A, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using a means and facility of interstate commerce and in and affecting interstate commerce, and which visual depiction was actually transported and transmitted using a means and facility of interstate commerce and in and affecting interstate commerce

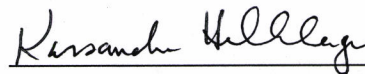
This criminal complaint is based upon these facts:

X Continued on the attached sheet.

Sworn to before me and signed in my presence.

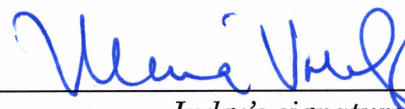
Date: January 25, 2019

City and state: Chicago, Illinois



Kassandra Hulliberger

Special Agent, Federal Bureau of Investigation



Judge's signature

MARIA VALDEZ, U.S. Magistrate Judge

Printed name and Title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

SS

AFFIDAVIT

I, Kassandra Hulliberger being duly sworn, state as follows:

1. I am Kassandra Hulliberger with the Federal Bureau of Investigation, and have been so employed since 2009. My current responsibilities include the investigation of child exploitation and child pornography.

2. This affidavit is submitted in support of a criminal complaint alleging that Michael Liedtke has violated Title 18, United States Code, Section 2251(a). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging LIEDTKE with manufacturing child pornography, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, my review of recordings and text messages, my training and experience, and the training and experience of other law enforcement officers with whom I have consulted.

A. Background of Investigation

4. According to information provided me to by another law enforcement officer, on or about January 20, 2019, at Facility A in DuPage County, Illinois, a

patron identified what he/she believed was a camera inside of a bathroom stall located in a discrete location within the ceiling. The patron contacted local law enforcement to report the camera.

5. According to information provided to me by another law enforcement officer, after the camera was discovered at or near the bathroom stall at Facility A, law enforcement investigated the camera to determine whether it linked to any other computer or electronic device within Facility A.

6. Following this investigation, on or about January 22, 2019, law enforcement officers interviewed MICHAEL LIEDTKE. LIEDTKE is a 34-year-old man who lives in Streamwood, Illinois. According to information provided by Individual A, LIEDTKE subleases space at Facility A. According to publicly available information, LIEDTKE is the president of Company A. According to Company A's website, Company A is the "parent company of all [its] training programs. Established in 2014 with the expansion of [its] volleyball clubs, [Company A] strives to provide premier training for youth athletes in the Chicagoland area." According to its website, Company A provides in-house training for boys and girls in 3rd to 6th grade.

7. According to information I received from law enforcement officers, LIEDTKE voluntarily arrived at the Glendale Heights police department for an interview. The interview with LIEDTKE was audio and video recorded, and I have reviewed that interview. At the beginning of the interview, LIEDTKE is informed

that the interview will be audio and video recorded and that he is voluntarily participating in the interview.

8. LIEDTKE admitted during the course of the interview that he installed the camera in the bathroom stall at Facility A, though LIEDTKE stated that he did this because he wanted to prevent individuals from smoking (or “vaping”) in the bathroom.

9. Further, LIEDTKE provided consent, on video, to search the contents of his cellular telephone (Subject Phone 1). LIEDTKE had his cellular phone with him when he arrived at Glendale Heights for an interview.

B. Search of Subject Phone 1 and Discovery of Child Pornography

10. Pursuant to LIEDTKE’s consent, law enforcement officers have searched the content of Subject Phone 1.

11. During the course of that search, law enforcement officers discovered a chain of text messages between LIEDTKE, using Subject Phone 1, and Minor A, using a phone ending in -9159.¹

¹ I believe that LIEDTKE is the user of Subject Phone 1 for the following reasons: (1) LIEDTKE had the phone with him when he voluntarily arrived at the Glendale Heights Police Department on or about January 22, 2019; (2) as described in further detail in this affidavit, LIEDTKE’s face is seen in videos sent to Minor A on or around December 16, 2018 from Subject Phone 1; and (3) the extraction report that was prepared after Subject Phone 1 was searched indicates that Subject Phone 1 has an associated user name of “Mike Liedtke.”

Further, I believe that Minor A is the user of the -9159 phone for the following reasons: (1) the phone contact information in Subject Phone 1 for this phone includes the first name of Minor A; and (2) as described in more detail in this affidavit, Minor A was interviewed on or about January 24, 2019, and Minor A stated that he/she is the user of the -9159 phone and engaged in the text message conversation with LIEDTKE described in further detail herein.

12. On or about January 24, 2019, Minor A was interviewed by a forensic interviewer at a Child Advocacy Center in Lake County, Illinois. Minor A is 16-years old and lives in Lake County, Illinois.

13. Between approximately 11:41 p.m. (CST) and 12:21 a.m. (CST),² from between approximately December 15, 2018, and December 16, 2018, LIEDKTE, using Subject Phone 1, and Minor A, using the -9159 phone engaged in the following text message conversation:³

MINOR A: Hey it's me

LIEDKTE: How about that video haha

MINOR A: I will as long as you do the same

LIEDKTE: Sure I'll send back whatever you send

MINOR A: [Sent Video 1 – a video approximately 7 seconds in length that shows a close-up video of masturbation.]

LIEDKTE: Wish my mouth was around that

² The timestamps in the extraction report for Subject Phone 1 were listed in Universal Time Coordinated ("UTC") time. Based upon my training and experience, I understand that UTC time is ahead of Central Standard Time by six hours. I have subtracted six hours from the times listed in the extraction report for purposes of this affidavit.

³ This affidavit contains a description of some of the text messages and content stored on Subject Phone 1. I base the language quoted on a preliminary review of the cited conversations and text messages. The times listed for the conversations are approximate. The summaries of the conversations do not include all conversations between the cited parties and contained within Subject Phone 1 but only those portions that are relevant to this affidavit.

At various points in this affidavit, I have included in brackets or otherwise my interpretation of words and phrases used in the quoted conversations. I base my interpretations on information received from other law enforcement officers, on the content and context of the conversations, events occurring before and after the conversations, my knowledge of the investigation as a whole, my experience and training, and the experience and training of other law enforcement agents in this investigation.

MINOR A: Me too so bad

LIEDTKE: [Sent Video 2 - a video approximately 13 seconds in length that shows a close-up video of masturbation.]

MINOR A: So hot I want to be on top of it now send me a video of you rubbing your chest

LIEDTKE It's your turn for a video

MINOR A: Ok what do u want now sweetie

LIEDTKE: Your whole body, eventually i want to see a video of you shooting your load so record that! [LIEDTKE asked Minor A to send a video in which Minor A masturbates and ejaculates.]

MINOR A: Will do

MINOR A: [Sent Video 3 - a video approximately 10 seconds in length that shows a close-up video of masturbation]

LIEDTKE: Where's the cumshot? [LIEDTKE wanted Minor A to send a video in which Minor A ejaculated.]

MINOR A: I'm not there yet you said eventually I have to jerk it more

LIEDTKE: [Sent Video 4 - a video approximately 17 seconds in length that shows LIEDTKE rubbing his bare chest and face]

LIEDTKE: Hope you like the full beard

MINOR A: You are so sexy I want to makout rn [right now] beards are so hot

LIEDTKE: Show me a video of you like I sent... I know you don't want face in nudes [LIEDTKE acknowledged that Minor A did not want to create a nude video with her/his face visible in the video] but just the top half with you rubbing your chest like I did

MINOR A: [Sent Video 5 - a video approximately 15 seconds in length that shows a small portion of Minor A's face and depicts Minor A rubbing his/her bare chest]

MINOR A: I look fat sorry

LIEDTKE: Omg you are far from fat.... I couldnt see your face though

MINOR A: U said I didn't have to put my face in it!

LIEDTKE: But I want to lick those nipples

LIEDTKE: You don't have to put your face in it while showing you nude haha

LIEDTKE: If you don't want to, you don't have to, but I'd like to see it

MINOR A: I want to bury my face in your chest

LIEDTKE: [Sent Video 6 - a video approximately 5 seconds in length showing a penis underneath a wash cloth that appears to be "waving."]

LIEDTKE: It's waving hi to you

MINOR A: [Minor A sent a picture of his/her face smiling]

MINOR A: Laughed at a movie [Minor A sent an emoji regarding Video 6]

LIEDTKE: You are too cute! Video would be nicer though so I can see you smiling and rubbing your chest

MINOR A: I'm gonna need to see some full body video with talking then

LIEDTKE: If you send the same

MINOR A: If you send that u get to see a video with my face

LIEDTKE: But I already one upped you and sent one with my face . . . I'm getting the short end of the deal lol

MINOR A: Ok fine daddy you win

MINOR A: [Sent Video 8 – a video approximately 9 seconds in length depicting Minor A’s full face and Minor A rubbing his/her bare chest]

MINOR A: I’m so gross

LIEDTKE: [Sent Video 9 – a video approximately 17 seconds in length of LIEDTKE rubbing his chest and face. During this video, LIEDTKE says, “[Minor A’s first name], you’re so hot. You’re far from gross. Do you like this body? What would you do with this?]

MINOR A: I would lick you all over and hold you so tight to feel that skin on skin contact

LIEDTKE: Show me that cumshot stud . . .I need to go to sleep haha

LIEDTKE: I want to hear you moan when you shoot on video

MINOR A: Ok gimme a sex and u have to send yours too with talking

LIEDTKE: You want to FaceTime?

MINOR A: Some other time

MINOR A: [Sent Video 10 – a video approximately 24 seconds in length showing close up masturbation with ejaculation]

MINOR A: Where’s mine

LIEDTKE: [Sent Video 11 – a video approximately 45 seconds in length showing close-up masturbation with ejaculation]

LIEDTKE: That was hot

MINOR A: Wow that was intense

MINOR A: Ttyl [talk to you later] daddy :)

14. I personally reviewed the text messages and videos referenced above on Subject Phone 1, on or about January 25, 2019.

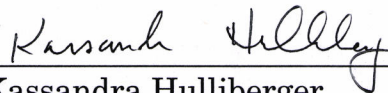
15. On or about January 24, 2019, Minor A was interviewed at a Child Advocacy Center in Lake County, Illinois. According to information provided to me by a law enforcement officer who witnessed that interview, Minor A identified LIEDKTE as a person that he/she met on an online dating site. Minor A stated that he/she never met LIEDTKE in person but that they exchanged pictures, videos, and mobile numbers.

16. Minor A disclosed that he/she sent LIEDKTE videos of himself/herself masturbating and that Minor A received videos from LIEDTKE of LIEDTKE masturbating.

CONCLUSION

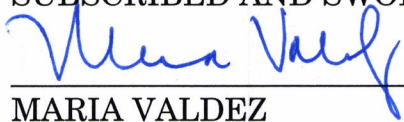
17. Based on the above information, I respectfully submit that there is probable cause to believe that MICHAEL LIEDTKE did knowingly employ, use, persuade, induce, entice, and coerce a minor, namely Minor A, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using a means and facility of interstate commerce and in and affecting interstate commerce, and which visual depiction was actually transported and transmitted using a means and facility of interstate commerce and in and affecting interstate commerce, in violation of Title 18, United States Code, Section 2251(a).

FURTHER AFFIANT SAYETH NOT.



Kassandra Hulliberger
Special Agent, Federal Bureau of
Investigation

SUBSCRIBED AND SWORN to before me on January 25, 2019.



MARIA VALDEZ
United States Magistrate Judge